IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA v.	Case No

COUNT ONE

Coercion and Enticement of a Minor

The Grand Jury Charges:

In or about August 2018 and continuing until on or about January 4, 2019, in the District of North Dakota, and elsewhere,

DUSTIN JAMES GILLEO

did use a facility of interstate commerce to knowingly persuade, induce, entice, and coerce STI, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with an offense;

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

Transportation of a Minor

The Grand Jury Further Charges:

On or about January 3, 2019, and continuing until on or about January 4, 2019, in the Districts of North Dakota, Minnesota, and elsewhere,

DUSTIN JAMES GILLEO

knowingly transported an individual who had not attained the age of 18 years in interstate commerce, with the intent that such individual engage in a sexual activity for which any person can be charged with a criminal offense, specifically: DUSTIN JAMES GILLEO transported 16-year-old STI from Minnesota to North Dakota with the intent that STI engage in sexual activity for which he could be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2423(a).

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Sections 2422 and 2423, as charged in this Indictment,

DUSTIN JAMES GILLEO

shall forfeit to the United States, any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violation, including, but not limited to, the following:

- Samsung SM-S76VL Cellular Phone, (IMEI) 356823091125125; and
- Lenovo Desktop Computer, SN: 1S2992E5UMJYTATE, which contains a five hundred (500) gigabyte (GB) Western Digital hard drive, SN: 174859423786, and a two (2) terabyte (TB) Seagate hard drive SN: 6XW1P9JZ.

By virtue of the commission by defendant of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2428.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

JKP/MRM/ljc